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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

LEAD EXPRESS, INC., *et al.*,

Defendants.

CASE NO. 2:20-cv-00840-JAD-NJK

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO FILE
ANSWER**
(Third Request)

Pursuant to Local Rule IA 6-1, the FTC and Defendants (collectively, the "Parties"), by and through their undersigned counsel, hereby stipulate and agree to extend the time for Defendants to answer or otherwise respond to the complaint in this action ("Complaint"). This is the third stipulation for extension of time to file an answer or otherwise respond to the Complaint. In support thereof, the Parties state:

1. Pursuant to the Court's Order, dated August 4, 2020 (ECF No. 68), Defendants' responsive pleadings are due on August 24, 2020.
2. The Parties stipulate and agree that good cause exists to extend the time to file an answer or otherwise respond to the Complaint, and the parties are acting in good faith. In particular, the Parties stipulated to the entry of Preliminary Injunctions (*see* ECF Nos. 44-47). Since then, the Parties have been working with the Receiver in the discharge of his duties, and Defendants have been taking all necessary steps to comply with the Preliminary Injunctions, which consumed their time and focus.
3. This 60-day extension to file responsive pleadings will not delay the proceedings because the Parties have agreed to begin limited discovery in advance of the responsive pleading deadline.

1. The Parties are also currently in settlement discussions. A possible settlement would
2. eliminate the need for Defendants to file a responsive pleading and avoid wasting time
3. and scare resources. Accordingly, Defendants seek a 60-day extension from August 24,
4. 2020, in which to file responsive pleadings. The FTC stipulates to this extension.
5. Therefore, the Parties stipulate and agree that Defendants shall have until August 24,
6. 2020, to October 23, 2020, to answer or otherwise respond to the Complaint.
7. This agreement shall be without prejudice to any party and is made in good faith and not for
8. the purpose of delay.
9.

10. **IT IS SO STIPULATED.**

11. */s/ Gregory A. Ashe*

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48. Daikoku Marketing, Inc., Takehisa Naito, and
49. Keishi Ikeda*

/s/ Justin Gray (by permission)

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IT IS SO ORDERED.

NO FURTHER EXTENSIONS WILL BE GRANTED.

Nancy J. Koppe
United States Magistrate Judge

DATED: August 24, 2020